EPSTEIN BECKER & GREEN, P.C.

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Ross University School of Medicine and Global Education International, Inc.

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

ROSS UNIVERSITY SCHOOL OF MEDICINE and GLOBAL EDUCATION INTERNATIONAL, INC.,

Plaintiffs,

V.

BEHZAD AMINI, WWW.ROSSU.NET, WWW.ROSSMEDICALSCHOOL.ORG, WWW.ROSSMEDSCHOOL.COM and WWW.JOHNDOEROSSINFRINGINGSITES1-20.DOE

Defendants.

Civil Action No. 3:13-cv-6121-AET-TJB

NOTICE OF MOTION

TO: Behzad Amini, Pro Se 13835 N. Tatum Blvd. NO. 9-280 Phoenix, AZ 85032

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 55, plaintiffs Ross University School of Medicine and Global Education International, Inc. ("Plaintiffs") shall move before the Honorable Anne E. Thompson, U.S.D.J., at the Clarkson S. Fisher Building and U.S. Courthouse, 402 East State Street, Trenton, New Jersey, on a date to be later determined, for an Order granting default judgment; and

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs

shall rely upon the accompanying Letter Brief in Support of Plaintiffs' Motion for Default Judgment and the Certification of James P. Flynn, Esq., with annexed exhibits.

Respectfully submitted,

EPSTEIN BECKER & GREEN, P.C. One Gateway Center Newark, New Jersey 07102 Attorneys for Plaintiffs

By: <u>s/James P. Flynn</u>
James P. Flynn
William S. Gyves
Members of the Firm

DATED: January 31, 2014